

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,                     )  
   )  
                  Plaintiffs,                     )  
   )  
                  v.                                 ) Civil Action No. 05-823-\*\*\* (MPT)  
   )  
STANLEY TAYLOR, et al.,                     )  
   )  
                  Defendants.                     )

FILED  
CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2007 OCT -1 AM 10:45

**CERTIFICATION**

At Wilmington this <sup>1<sup>st</sup></sup> day of October, 2007;

I, Nancy Rebeschini, Esquire, pro se law clerk, and designated officer for depositions upon written questions held before me on September 25, 2007, do here by certify that:

1. The deposition of Wenston White was held on September 25, 2007, at the J. Caleb Boggs Federal Building, Wilmington, Delaware.

2. On that same date, Wenston White declared before me, an individual authorized to administer oaths, that his written answers were true and correct.

3. I read aloud each and every deposition question submitted by plaintiff, George A. Jackson, for deponent, Wenston White.


4. I personally observed deponent, Wenston White, answer in writing, the deposition questions.

5. A true and correct copy of the written questions filed by plaintiff, the original written answers of deponent, and written original objections made by his counsel are attached hereto and are filed with the court, and copies shall be served upon the parties

and the deponents.

I, Nancy Rebeschini, certify under penalty of perjury that the foregoing is true and correct.


Executed this 1<sup>st</sup> day of October, 2007.

  
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Nancy Rebeschini, Esquire, Designated  
Officer

CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2007, I caused to be electronically filed the attached Certification with the Clerk of the Court using CM/ECF, which will send notification of such filing to Eileen Kelly, Esquire, counsel for defendants. I further certify I caused a true and correct copy of the attached Certification to be served via U.S. mail on plaintiffs: George A. Jackson, SBI No. 171250, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Darus Young, SBI No. 282852, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Charles Blizzard, SBI No. 166670, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Frank Williams, SBI No. 261867, Sussex Correctional Institution. P. O. Box 500, Georgetown, DE 19947; Roy R. Williamson, SBI No. 291856, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Anthony Morris, SBI No. 300363, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Carl Walker, SBI No. 173378, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Samuel Jones, SBI No. 465297, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Darwin A. Savage, SBI No. 232561, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Adrain Wright, SBI NO. 169921, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Gilbert Williams, SBI No. 137575, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Charles B. Sanders, SBI No. 160428, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Joseph White, SBI No. 082985, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Timothy L. Malloy, SBI No. 171278, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Howard Parker,

SBI No. 165324, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Kevin Spivey, SBI No. 258693, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; James Johnson, SBI No. 155123, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Vernon Truitt, SBI No. 188191, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Roderick Brown, SBI No. 315954, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; José Serpa, SBI No. 350322, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Roger Thomas, SBI No. 292590, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; John F. Davis, SBI No. 263753, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Lawrence B. Dickens, SBI No. 124570, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Eldon Potts, SBI No. 211193, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Jerome Green, SBI No. 147772, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; and Rique Reynolds, SBI No. 266486, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947.

  
Nancy Rebeschini, Esquire,  
Designated Officer

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C.A. No. 05-823-\*\*\*

PLAINTIFF GEORGE A. JACKSON'S WRITTEN DEPOSITIONS  
TO DEPOSE DEFENDANT WENSTON WHITE

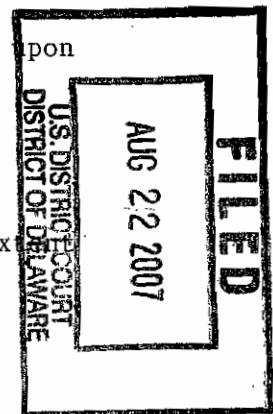
Plaintiff George A. Jackson, pro se, hereby depose defendant upon  
Order of the Court:

GENERAL OBJECTIONS

1. Plaintiff objects to the deposing of defendants to the extent  
of written depositions. Just for the record.

WRITTEN DEPOSITIONS

1. How long have you been employed with the Delaware Department  
of Corrections?
2. Are you under the influence of any medication?
3. Have you had a chance to review the Amend Complaint, your  
"Response to Plaintiffs' Interrogatories", and any previous statements  
you given to defendants' counsel or any one else in connection with this  
case before coming here today?
4. Have you had a chance to meet and discuss the case with  
defendants' counsel?
5. Do you realize that you are under oath, just as if you were  
at trial testifying?
6. Is there any reason you can't give your best testimony today?



*BD scanned*

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7. Have you ever completed any accredited program on food safety, personal hygiene, preparation, cooking, proper cleaning and sanitizing before July 1, 2005? If yes, please state the name of the accredited program and the date of completion.

8. Do you agree or disagree. When a person is working under conditions that exhibits excessive heat and high humidity, a person body works at a much higher stress level due to the lack of oxygen in the air?

9. Since you have worked at the SCI kitchen, when an inmate complain of any illness, does the SCI food service staff diagnose the inmate worker, or is he refer to the medical unit to be examined by the proper authorized personnel?

10. In your "Response no. 2 to Plaintiffs' Interrogatories", you indicated, "Yes". Did you make a general assessment of the inmate workers complaint before notifying Defendant Senato and the SCI Maintenance Department?

11. During the hot summer months when temperature rise and/or exceeds 100 degree, what precautionary instructions are told to the inmate workers during these hot days?

12. Are you aware there are only one (1) toilet seat for 22-25 inmate workers to use which forces some workers to wait long periods, or even relieving themselves in the floor drain in the trayroom area?

13. Since the filing of the institutional grievance and the lawsuit, have the work conditions improved or remained the same?

14. When inmate kitchen workers was housed in the air condition cool Merit building, if they refused to work or get fired, would that inmate received a major disciplinary report (class I), and immediately moved to a lesser desireable housing unit?

15. On July, 20, 2005, an inmate reportedely found a parasite (larva) in his Beef Cube Streak, after an intense investigation wich included an inspection of the kitchen area, was any replacement vermin control equipment such as bug lights ordered for the kitchen area?



WENSTON WHITE

9-25-07

1. 8 YEARS
2. YES
3. I DON'T UNDERSTAND QUESTION
4. I DON'T UNDERSTAND QUESTION
5. YES
6. NO
7. YES SEE SAFE DATE UNKNOWN
8. DISAGREE
9. REFER TO MEDICAL
10. NO
11. TAKE A BREAK IF NEEDED DRINK WATER
12. TOILET YES DRAIN NO
13. KITCHEN IMPROVED ON REGULAR BASES
14. NOT SURE OF INMATE AFTER TERMINATION
15. BUG LIGHT INSTALLED BEFORE INCIDENT

WENS

Wenston White

Wenston White 9/25/07

Eileen Kelly, Esq. DAG

3. Objection.

4. Objection. Instruct witness not to provide any information regarding any discussion with me (Eileen Kelly) or Catherine Damavandi.

10. Objection. Witness hasn't been provided with interrogatories and hasn't had opportunity to review question.

12. Objection.

Eileen Kelly, DAG 9/25/07